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September 18, 2025

Hon. Joan M. Azrack
United States District Judge
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Henriquez, et al. (Fredy Ivan Jandres-Parada), Cr. Docket No. 20-577 (JMA)

Dear Judge Azrack:

Along with John Burke, I represent Mr. Jandres-Parada in the above-referenced matter. Mr. Burke was added to the defense team in late April and has had a chance to review the discovery and to meet with Mr. Jandres-Parada and I, in the segregated housing unit at the MDC, on a number of occasions. This is, however, a very complicated matter in terms of the breadth and severity of the charges, Mr. Jandres-Parada's personal history, and evolving defense strategies. The defense needs more time in an effort to sort all this out.

Accordingly, we seek a two-month adjournment of the status conference presently scheduled for September 23, 2025, at 12:30. Mr. Burke will be on trial in November and December 2025 in United States v. Larin, et al, EDNY (J. D'Arcy Hall), 20 Cr. 228 (S-3), so he is requesting that the status conference take place on a Friday, the one day off per week from the trial. If a Friday date is unavailable I will cover the conference alone.

Mr. Jandres-Parada and the government (as per AUSA Justina Geraci) consent to this request. Mr. Jandres-Parada also consents to the continuing exclusion of time under the Speedy Trial Act.

Respectfully submitted,


James M. Branden